

Exhibit B

5.26.10 LIST OF DOCUMENTS NYCLU INTENDS TO CHALLENGE FINAL

This chart lists the redacted or withheld material that the NYCLU intends to challenge. The chart has been narrowed repeatedly following phone conversations and further disclosures the government has made over the past few months. The information in the column below labeled "Redactions the NYCLU Intends to Challenge" was taken from the draft Vaughn indices provided by the government during March, April and May 2010. Additionally, during our conversation on May 21, 2010 and in an email from May 26, 2010, the government indicated that a number of the redactions/withholdings that it previously had sought to justify under both exemptions b2-high and 7e are now only being claimed under 7e. The NYCLU has updated its chart to reflect this change.

	Agency	Bates Numbers	Document Title	Redactions the NYCLU Intends to Challenge	Exemptions Claimed
FEMA					
1	FEMA	FEMA_00012-S to FEMA_00013-S	FY 2006 UASI Funding Request for Investment #5 (Final)	Redacted information concerning equipment used in connection with LMSI, text concerning geographic placement of operational facets of LMSI program	7e
2	FEMA	FEMA_00070 to FEMA_00072	Emails within DHS	Redacted information concerning locations at which security system components will be installed	7e
3	FEMA	FEMA_00105-S	FY 2007 UASI Funding Request for Investment 33 (Final)	Redacted the number of license-plate readers	7e
4	FEMA	FEMA_00106-S	FY 2007 UASI Funding Request for Investment 33 (Final)	Redacted number of license-plate readers and cameras deployed	7e
5	FEMA	FEMA_00158-S	FY 2008 UASI Funding Request for Investment #2 (Final)	Redacted number of cameras and license plate readers to be deployed	7e
6	FEMA	FEMA_00179-S	Grants Reporting Tool entries in 2008 BSIR (for reporting period 1/1/09 to 6/30/09)	Redacted information in project description concerning number of license-plate readers and cameras deployed	7e
7	FEMA	FEMA_00214-S to FEMA_00215-S	FY 2009 UASI Funding Request for Investment #5 (Final)	Redacted information concerning equipment to be used in LMSI, information concerning the assets to be protected under LMSI	7e
8	FEMA	FEMA_00218-S to FEMA_00219-S	FY 2009 UASI Funding Request for Investment #5 (Final)	Redacted information concerning project accomplishments to be completed, including timeline for completing each accomplishment and challenges of accomplishing such	7e

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	Agency	Bates Numbers	Document Title	Redactions the NYCLU Intends to Challenge	Exemptions Claimed
				milestones	
9	FEMA	FEMA_00231-S	FY 2009 UASI Funding Request for Investment #5 (Midterm Submission)	Redacted information concerning accomplishments and challenges to LMSI	7e
10	FEMA	FEMA_00258-S	NY 2007 BSIR Detail Project Report (for reporting period 7/1/08 to 12/31/08)	Redacted information concerning equipment to be used in the program ¹	7e
11	FEMA	FEMA_00260-S, FEMA_00262-S	NY 2008 Initial Strategy Implementation Plan for Critical Infrastructure Protection Investment Justification	Redacted “operational details” concerning proposed project’s protection of critical infrastructure	7e
12	FEMA	FEMA_00274-S to FEMA_00278-S	Spreadsheet of LMSI assets, attached to 7/3/07 email	Redacted information concerning identified LMSI assets	7e
13	FEMA	FEMA_00308-S, FEMA_00310-S	Emails within DHS	Redacted information concerning number of assets protected under the LMSI	High 2, 7e
14	FEMA	FEMA_00338 to FEMA_00340	Notes for June 7, 2007 LMSI Meeting	Redacted number of infrastructure assets	High 2, 7e
15	FEMA	FEMA_00346, FEMA_00348	Emails within DHS	Redacted number of infrastructure assets and suggested agenda items for G&T meeting	High 2, 7e
16	FEMA	FEMA_00356 to FEMA_00359	DHS Memorandum	Redacted information re: number, location and names of LMSI assets of interest and the proposed timeline for development of the LMSI project	High 2, 5, 7e
NPPD					
1	NPPD	NPPD_00008 to NPPD_00009	LMSI Background Research Paper	Redacted list of infrastructure assets of interest to DHS	High 2, 7e

¹ In a previous version of the “List of Documents the NYCLU Intends to Challenge” dated May 24, 2010, the NYCLU indicated that, in addition to the information concerning equipment to be used in the program, it intended to challenge the redacted information concerning “targets to be protected by the program,” which was included on FEMA_00258-S in the government’s draft list of “Responses to Questions Regarding FEMA Document Redactions” dated March 19, 2010. On May 26, 2010, the government informed the NYCLU that this information was not contained on FEMA_00258-S. Accordingly, the NYCLU has deleted this clause from the chart.

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	Agency	Bates Numbers	Document Title	Redactions the NYCLU Intends to Challenge	Exemptions Claimed
2	NPPD	NPPD_00020 to NPPD_00088	LMSI Background Research Paper	Withheld in full, "Names, facility facts, 'significant information'"	High 2, 7e
3	NPPD	NPPD_00122 to NPPD_00143	LMSI PowerPoint Presentation	Redacted map showing proposed locations of CCTV cameras and license plate readers and other "operational details"	7e
4	NPPD	NPPD_00144 to NPPD_00146	LMSI Briefing Memorandum dated 2/14/08	Withheld in full, Internal document containing information regarding coordination with NYPD, S&T, and FEMA and detailed outlines of plans, progress, requirements and ultimate goals of project	2, 5, 7e
5	NPPD	NPPD_00147 to NPPD_00151	LMSI Briefing Memorandum dated 7/16/08	Withheld in full, Internal document containing information regarding coordination w/NYPD and DHS and detailed outlines of plans and progress of project	2, 5, 7e
6	NPPD	NPPD_00254 to NPPD_00255	LMSI Information Memorandum dated 7/16/08	Redacted information on LMSI assets and number of assets protected	High 2, 7e
7	NPPD	NPPD_00271 to NPPD_00275	Spreadsheet of LMSI assets, attached to 7/3/07 email from Jaysen Goodwin, PSCD	Redacted number, identification and location of key critical infrastructure assets within LMSI of homeland security interest	7e